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PIPER & MARBURY
L.L.P.

1200 NINETEENTH STREET, N.W.
WASHINGTON, D.C. 20036-2430

202-861-3900
FAX: 202-223-2085

WRITER'S DIRECT NUMBER
(202) 861-3949
FAX: (202) 223-2085
Rcrittendon@pipermar.com

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December 8, 1998

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DEC - 8 1998

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

BY HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, DC 20554

Re: Docket No. RM9108
Ex Parte Presentation

Dear Ms. Roman Salas

Pursuant to Section 1.1206 of the Commission's rules, this is to advise you that, in my capacity as counsel to Long Distance International Inc. ("LDI"), a provider of 1010XXX service, I, along with representatives of LDI met yesterday with Kyle D. Dixon, Legal Advisor to Commissioner Michael K. Powell.

During this meeting, we discussed LDI's position with respect to the inability of interexchange carriers to identify incumbent local exchange carriers or competitive local exchange carriers for casual calls. A copy of the following enclosures were submitted to Mr. Dixon:

- An LDI memorandum entitled "Casual Calling Problem" and
- An LDI written presentation describing LDI's business operations, outlining the casual calling problem, and setting forth possible solutions.

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Ms. Magalie Roman Salas
December 8, 1998
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In accordance with the Commission's rules, I am hereby submitting one original and one copy of this letter and its enclosures for the above-referenced proceeding.

Sincerely,



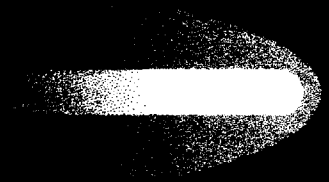
Renée Roland Crittendon

RRC/deb
Enclosures

cc(w/o encl.): Kyle D. Dixon

cc(w/encl.): Dorothy Attwood
Jonathan B. Mirsky
Len Sawicki

LONG DISTANCE INTERNATIONAL INC.



Notes:

LONG DISTANCE
INTERNATIONAL INC.

CASUAL CALLING

RANDY SEEVAALOE
DIRECTOR REGULATORY AFFAIRS
LONG DISTANCE INTERNATIONAL INC.

CASUAL CALLING "NIGHTMARES"

FACT
OR
FICTION!

Notes:

LONG DISTANCE INTERNATIONAL INC.

.. WHO ARE WE

- We are a company that provides long distance international service.
- We are a company that provides long distance international service.
- We are a company that provides long distance international service.
- We are a company that provides long distance international service.

LONG DISTANCE INTERNATIONAL INC.

.. WHY DOES EDC ARE ABOUT CASUAL CALLING

- We are a company that provides long distance international service.
- We are a company that provides long distance international service.
- We are a company that provides long distance international service.
- We are a company that provides long distance international service.

MAJOR "CHALLENGES"

.. CHALLENGES CAUSED BY THE FOLLOWING:

- We are a company that provides long distance international service.
- We are a company that provides long distance international service.
- We are a company that provides long distance international service.
- We are a company that provides long distance international service.

Notes:

CLECS

CLEC RESELLERS

DETAILS

- Bill of Material Collection Agreement
- BNA
- Identification of Resold ANIs
- End User

HOW DOES EDC COMBAT THE PROBLEM TODAY?

- WHERE INFORMATION IS AVAILABLE EDC "BLOCKS" ALL ANIs BELONGING TO FACILITIES BASED CLECS
- WHERE POSSIBLE THROUGH AN ACCUMULATION OF INFORMATION FROM MANY SOURCES EDC "BLOCKS" ANIs BELONGING TO CLEC RESELLERS THROUGH THE "No-Transit" Rule
- NOT AN OPTIMAL APPROACH TO CASE MANAGEMENT

Notes:

PROPOSED SOLUTIONS

•• SHORT TERM

- Industry Forum hosted by FCC to look at issues
- Postmaster's Bulletin Board of all ANIs to CLEC Reseller
- Billing and Collection Agreements (affordable) with the CLECS
- CLEC Reseller (End User) pay FNC - casual caller bills

PROPOSED SOLUTIONS

•• LONG TERM

- Build an "affordable" database similar to LIDB accessible to all carriers
- Billing and Collection Agreements with CLECS and CLEC Resellers

THE "NIGHTMARE"

- PERPETUATION OF FRAUD
- BLOCKING OF ANIS
- LESS CONSUMER CHOICE
- POSSIBLE EXTINCTION OF CASUAL CALLING

Notes:

Randy Sue Valove
Director Regulatory Affairs

Long Distance International Inc.
604-827-7575
randy@ldw-ld.com

CASUAL CALLING PROBLEM

PROBLEM

- The inability of interexchange carriers ("IXCs") to identify the incumbent local exchange carrier ("ILEC") or competitive local exchange carrier ("CLEC") for casual calls (*i.e.*, 1010XXX, 0⁺, 0⁻) thereby not allowing IXCs to determine whether it has a billing arrangement with the ILEC or CLEC which has the potential of encouraging consumer fraud.

REASON

- With the introduction of competition to the local exchange and associated policies such as resale and local number portability, NPA-NXXs can no longer be identified with a particular ILEC or CLEC.

SOLUTIONS

- A ten-digit line number data base, such as LIDB, that identifies an ILEC and CLEC.
- Require cost effective, non-discriminatory billing solutions, *i.e.*, require each LEC to offer billing and collection services at a reasonable prices.
- Realizing that the implementation of a ten digit line number data base may be time consuming, as an interim measure, require ILECs and CLECs to provide IXCs with a means by which to identify telephone numbers which they serve and, if necessary, protect such information by treating it as consumer proprietary network information. (47 U.S.C. § 222 (b), (c) 1996; 47 C.F.R. § 64.2005).

CONCLUSION

- Absent an interim or long-term solution, customer choice through casual calling will become unavailable thus resulting in IXCs being forced to block such calls. In the process, the growth of ILECs, CLECs and IXCs will be inhibited.